

1 Steve W. Berman (*pro hac vice*)  
2 **HAGENS BERMAN SOBOL SHAPIRO**  
3 **LLP**  
4 1301 Second Avenue Suite 2000  
5 Seattle, WA 98101  
6 Telephone: (206) 623-7292  
7 Facsimile: (206) 623-0594  
8 steve@hbsslaw.com

9 Ben M. Harrington (SBN 313877)  
10 **HAGENS BERMAN SOBOL SHAPIRO**  
11 **LLP**  
12 715 Hearst Avenue, Suite 300  
13 Berkeley, CA 94710  
14 Telephone: (510) 725-3000  
15 Facsimile: (510) 725-3001  
16 benh@hbsslaw.com

17 *Attorneys for Plaintiffs and the Proposed*  
18 *Class*

19 *Additional counsel on signature page*

20  
21  
22  
23  
24  
25  
26  
27  
28  
**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

AFFINITY CREDIT UNION, et al.,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Belinda S. Lee (Cal. Bar No. 199635)  
Sarah M. Ray (Cal. Bar No. 229670)  
Aaron T. Chiu (Cal. Bar No. 287788)  
**LATHAM & WATKINS LLP**  
505 Montgomery Street, Suite 2000  
San Francisco, California 94111-6538  
Telephone: (415) 391-0600  
belinda.lee@lw.com  
sarah.ray@lw.com  
aaron.chiu@lw.com

*Attorneys for Defendant Apple Inc.*

No. 4:22-cv-4174-JSW-KAW

**STIPULATION AND [PROPOSED]  
ORDER ENLARGING PAGES FOR  
EXHIBITS IN SUPPORT OF JOINT  
DISCOVERY LETTER BRIEF**

Judge: The Honorable Kandis A. Westmore

Pursuant to Civil Local Rule 7-11, Plaintiffs and Defendant Apple Inc. (together, the “Parties”), by and through their respective attorneys of record, hereby stipulate as follows:

WHEREAS, the Parties are submitting a Joint Letter Brief outlining certain disputes related to the adequacy of Apple’s privilege log;

WHEREAS, this Court’s Standing Order sets a 12-page limit for exhibits to Joint Letter Briefs;

WHEREAS, the Parties agree that submission of additional materials beyond the 12-page limit may assist the Court in adjudicating the disputes outlined in the Joint Letter Brief;

WHEREAS, having met and conferred, and subject to the Court’s authorization, the Parties **STIPULATE AND AGREE** to the submission of the following exhibits accompanying the Joint Letter Brief: (a) Apple’s current privilege log (Exhibit A); (b) Consumer Credit Union’s and GreenState Credit Union’s current privilege logs (Exhibit B); and (c) APL-ACU\_00988945-964 (Exhibit C).

By: /s/ Ben M. Harrington  
Ben M. Harrington (Cal. Bar No. 313877)  
*benh@hbsslaw.com*  
HAGENS BERMAN SOBOL SHAPIRO LLP  
715 Hearst Avenue, Suite 202  
Berkeley, California 94710  
Telephone: +1.510.725.3000

Steve W. Berman (*pro hac vice*)  
*steveb@hbsslaw.com*  
1301 Second Avenue, Suite 2000  
Seattle, Washington 98101  
Telephone: +1.206.623.7292

Eamon P. Kelly (*pro hac vice*)  
Joseph M. Vanek (*pro hac vice*)  
Jeffrey H. Bergman (*pro hac vice*)  
SPERLING KENNY  
NACHWALTER, LLC  
321 N. Clark St., 25th Floor  
Chicago, IL 60654  
Telephone: (312) 676-5845  
Facsimile: (312) 641-6492  
*ekelly@sperlingkenny.com*  
*jvanek@sperlingkenny.com*  
*jbergman@sperlingkenny.com*

By: /s/ Belinda S Lee  
Belinda S Lee (Cal. Bar No. 199635)  
*belinda.lee@lw.com*  
Sarah M. Ray (Cal. Bar No. 229670)  
*sarah.ray@lw.com*  
Aaron T. Chiu (Cal. Bar No. 287788)  
*aaron.chiu@lw.com*  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, California 94111-6538  
Telephone: +1.415.391.0600

*Attorneys for Defendant Apple Inc.*

1 Phillip F. Cramer (*pro hac vice*)  
2 SPERLING KENNY  
3 NACHWALTER, LLC  
4 1221 Broadway, Suite 2140  
5 Nashville, TN 37203  
6 Telephone: (312) 224-1512  
7 Facsimile: (312) 641-6492  
8 pcramer@ sperlingkenny.com

9 *Attorneys for Plaintiffs and the*  
10 *Proposed Class*

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
**SIGNATURE ATTESTATION**

I, Ben M. Harrington, am the CM/ECF user whose ID and password are being used to file this Stipulation and [Proposed] Order Enlarging Pages for Exhibits in Support of Joint Discovery Letter Brief Pursuant to Local Rule 6-2. In compliance with Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories.

DATED: April 10, 2025

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Ben M. Harrington  
Ben M. Harrington (SBN 313877)

**[PROPOSED] ORDER**

Having considered the Parties' stipulation and Plaintiffs' accompanying administrative motion, IT IS HEREBY ORDERED THAT this Court's page limits for Joint-Letter Brief exhibits, *see* Standing Order ¶ 14(b)(ii), shall be enlarged to accommodate Exhibits A-C to the Parties' Joint Letter Brief outlining disputes related to Apple's privilege log.

**IT IS SO ORDERED.**

Dated: \_\_\_\_\_, 2025

\_\_\_\_\_  
KANDIS A. WESTMORE  
United States Magistrate Judge